

# COMMENTS TO THE FCC

## In the Matter Of 800 MHZ Public Safety Interference Proceeding

WT Docket No. 02-55

Filed on behalf of :

***The Baltimore Gas and Electric Company***

1068 N. Front Street

Baltimore, MD. 21202-4129

Attn: A. Jeffrey Slack, Sr. Project Engineer

The Baltimore Gas and Electric Company (BGE) operates a 14-channel wide-area 800mhz simulcast radio system in central Maryland as the primary communication tool for all of its critical electric and gas service crews. This system has been in place for 15 years, and has served BGE extremely well during that period. Recently, however, BGE has become involved in the above referenced matter due to the same growing interference issues that now plague the public safety sector. We have been following the NPRM very closely since Nextel made their proposal in November of 2001, with the hope that logic would prevail in the ensuing exchange of ideas. BGE's interests in this matter have been well represented by the UTC, but at this time I feel compelled to submit my own comments. BGE is not part of the Private Wireless Coalition (PWC), and we want to make it clear that the PWC does not necessarily represent BGE's best interest in their proposal. BGE is more in line with the solutions proposed by the UTC, and has some specific areas of conflict with the PWC proposal. BGE's main areas of concern are outlined below.

Of BGE's 14 wide-area channels, three are in the current General Category range which would need to be vacated in the early stages of the transition process. As long as BGE receives equivalent channels in return, this transition would only involve software changes to repeaters at our 10 tower sites. No changes to user equipment would be required for this channel re-tuning, so the cost to BGE would be relatively low.

However, two of BGE's system *control channels* are currently located above 859Mhz, which is being proposed as a Guard Band under the PWC plan. If these two channels are forced to relocate, or otherwise suffer degradation, BGE would be forced to not only retune repeaters at 10 tower sites, but physically reprogram every one of over 2000 user radios on the system. This process would be very costly and time consuming for BGE. BGE does not agree with this concept of a Guard Band between 859 and 861Mhz. It seems that the onus is being placed solely on the private sector to sacrifice valuable space in the band for the sake of reducing interference. If such a guard band is needed, why can't it come from the lower portion of the commercial band above 861Mhz,

or at least split the difference? If nothing else, critical infrastructure companies like BGE should be grandfathered to continue operating our systems under our original license parameters in this region of the band. It does not make sense that private radio users should lose primary use of this valuable spectrum when we are not the ones creating the interference.

Another area of concern to BGE is the definition of 'non-cellular' systems that will be allowed to operate in the new segment of the band between 851Mhz and 861Mhz. I believe that definition is too narrow, and might prevent CI utilities like BGE from upgrading their 800Mhz systems in the future. The logical upgrade path for BGE's system is to replace its analog simulcast network with a digital network that utilizes site hand-off technology. However, it is not clear whether the PWC definition would allow such a system in our portion of the band, even if we retained a high-tower high-power design. Utilities should not be prohibited from such an upgrade in the interest of reducing interference, when better technical parameters are really the answer. Newer technologies are, in fact, the answer to many of our problems and the path to interoperability between organizations with mutual interests in homeland security.

Thank you for the opportunity to submit these comments in the matter listed above. Please consider them seriously when making the final decisions on the future of the 800Mhz band.

Yours truly,

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